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Newark / Philadelphia

May 30, 2023

Via ECF

Hon. André M. Espinosa, U.S.M.J.
U.S. District Court District of New Jersey
Martin Luther King, Jr. Courthouse
50 Market Street
Newark, NJ 07101

**Re: *Duncan v. City of Paterson, et al*
Civil Action No. 20-8471**

Dear Judge Espinosa:

This office represents the City of Paterson (the “City”) in the above captioned matter. Please accept this letter as a request for a 14-day extension to allow the City to file its motion for contribution. We are in the process of coordinating with city representatives to confirm the expenses required to produce the documents. Plaintiff’s counsel has consented to this request.

If same is acceptable we respectfully request that Your Honor so order this letter, making the City’s Motion due June 13, 2023.

Should the Your Honor require additional submissions, please do not hesitate to contact me.

Respectfully requested,

/s/ Victor A. Afanador

Victor A. Afanador

VAA:cd

cc: Counsel of Record (via ECF)

So Ordered:

Hon. André M. Espinosa, U.S.M.J.